

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IMPERIUM IP HOLDINGS (CAYMAN), LTD.,)	
)	
Plaintiff and Counterclaim Defendant,)	
)	Case No. 4:14-cv-00371 (RC)(ALM)
v.)	
)	
SAMSUNG ELECTRONICS CO., LTD.,)	
SAMSUNG ELECTRONICS AMERICA, INC.,)	
SAMSUNG TELECOMMUNICATIONS)	JURY TRIAL DEMANDED
AMERICA, LLC, AND SAMSUNG)	
SEMICONDUCTOR, INC.)	
)	
Defendants and Counterclaim Plaintiffs.)	

DEFENDANTS' NOTICE OF INTENT TO OFFER CERTIFIED RECORDS

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (collectively “Samsung”) hereby give notice of their intent to offer into evidence the following certified records:

Document Title	Bates Number
1997-01-10 - Japanese Patent Application Pub. No. H9-6592 entitled “Semiconductor Integrated Circuit” (Seki -Toshiba) with certified translation	SAM-371_00097888-7944
1999-04-30 - Japanese Patent Application Pub. No. H11-119288 entitled “Strobe Device” (Shimada - Olympus) with certified translation	SAM-371_00101100-1127
1989-11-21 – Japanese Patent Application Pub. No. H01-289925 entitled “Stroboscopic System for Cameras” (Nakajima – Olympus) with certified translation	SAM-371_00101154-1180
1999-06-08 - Japanese Patent Application Pub. No. H11-155107 entitled “Image Pickup Device” (Hata - Ricoh Company) with certified translation	SAM-371_00096442-6480
1989-08-17 - Japanese Patent Application Pub. No. H1-204578 entitled “Television Camera” (Noda - Hitachi, Ltd.) with certified translation	SAM-371_00096481-6510
1998-04-04 - Japanese Patent Application Pub. No. H10-98650 entitled “Image Pickup Device” (Kato - Hitachi Ltd.) with certified translation	SAM-371_00096672-6695
1992-05-01 - Japanese Patent Application Pub. No. 1992-130866 entitled “Electronic Imaging Apparatus Provided With Fluorescent Lamp for Illumination” (Iwamatsu - Fuji) with certified translation	SAM-371_00465184-5195

Samsung has already made these documents and certifications available to Imperium for inspection.

Respectfully submitted,

Dated: December 28, 2015

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 28, 2015.

/s/ John F. Bufo